

DANNY GRACE PLLC

ATTORNEYS AND COUNSELORS AT LAW

Writer's email: yuting@dannygracepc.com
Writer Admitted in: New York, United States District Court
for the Southern and Eastern Districts of
New York

225 BROADWAY, SUITE 1200
NEW YORK, NY 10007
212.202-2485
718-732-2821 FAX

Hon. Laura Taylor Swain
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

MEMO ENDORSED

Re: Perez Perez, et al. v. JRS Service, et al. (Civ. No. 1:20-cv-08010-LTS-GWG)

Dear Judge Swain:

We represent the Defendants in the above-referenced matter. We write to your Honor to respectfully request an adjournment of the pretrial conference, which is currently scheduled for July 11, 2025 (ECF No. 312).

This is our first request. Plaintiffs do not object to the request. An adjournment is necessary partially because the Parties are waiting for this Court's decision on Defendants' pending motion for summary judgment, and in part due to a scheduling conflict. Specifically, on October 15, 2024, Defendants filed their motion for summary judgment (ECF No. 299). If Defendants' motion for summary judgment is granted in full or in part, it would obviate the need for a trial in this matter or it would frame elements in a joint pretrial order.

Further, Defendants and Plaintiffs are required to appear in person on July 11, 2025, at 9:30 a.m. in the Supreme Court of the State of New York, County of Broome, in Binghamton, NY, where Plaintiffs sued Defendants herein, and additional parties LeChase Construction Services LLC ("LeChase") and Greystar Development Services LLC f/d/b/a EdR Maplewood LLC, f/d/b/a EdR Trust ("Greystar") under the New York Labor Law and Fair Labor Standards Act for the same projects that are at issue in this action and Defendants herein, parties LeChase and Greystar each have filed motions to dismiss Plaintiffs' complaint in that action. (N.Y.S. ECF Nos. 22, 44, and 49) (hereafter, "State Action"). Attached as **Exhibit A** is Plaintiffs' Complaint, dated March 12, 2025 (N.Y.S. ECF No. 10), filed with the Supreme Court of the State of New York, County of Broome.

(Case No. EFCA2025000158). The judge in that action has assigned July 11, 2025, for argument on all pending motions.

Thus, Defendants respectfully request an adjournment of the pretrial conference in this action. The Parties are available for a pretrial conference from 10:00 a.m. to 12:00 p.m. on September 4, 2025, generally available on September 10, 2025, and from 1:00 p.m. to 4:30 p.m., September 16, 2025.

We are thankful for the Court's time and consideration.

Dated: June 3, 2025

Respectfully submitted,

A handwritten signature in cursive script, reading "Yuting Li", is written over a horizontal line.

Yuting Li, Esq.
Danny Grace PLLC
225 Broadway, Suite 1200
New York, NY 10007
(212) 202 -2485
Attorneys for Defendants

The foregoing request is granted. The final pretrial conference is hereby adjourned from July 11, 2025 to **October 24, 2025 at 10:30 am**, and the related consultation and submission requirements are suspended pending further order of the Court. DE 313 resolved.

SO ORDERED

6/6/2025

/s/ Laura Taylor Swain, Chief USDJ